

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**GRENILE GAINEY, et al.,**

**Plaintiffs,**

**v.**

**CITY OF PHILADELPHIA, et al.,**

**Defendants.**

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**Civil Action  
No. 22-4143**

**Joint Status Report**

Pursuant to this Honorable Court’s September 30, 2024, order (ECF No. 93), the parties provide to this Court the following joint status report on their compliance with this Court’s August 21, 2024, order (the “Order”) (ECF No. 84):

On August 26, 2024, in accordance with paragraph number 1 of this Court’s Order (ECF No. 84 at ¶ 1), Defendant prepared and served an index of documents produced to Plaintiffs and accompanying letter. (*See generally* 8/26/24 Letter and attached Exhibits, attached as Exhibit 1). In accordance with paragraphs number 2 and 3 of this Court’s Order (ECF No. 84 at ¶¶ 2-3), Defendant emphasized to Plaintiffs that they have served upon them everything currently in its possession responsive to Plaintiffs’ requests and has not withheld any documents for privilege or under the work product doctrine. (*See* Exhibit 1 at p. 1-2).

Pursuant to paragraph 4 of the Order, Plaintiffs filed a supplement to their Motion to Compel Deposition.<sup>1</sup> (ECF No. 92).

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<sup>1</sup> Defendant notes that this joint status report is not a concession that Plaintiffs have complied with paragraph 4 of the Order.

Pursuant to paragraph 5 of the Order, Defendant does not intend to supplement their briefing unless Plaintiffs file supplemental briefing in connection with Defendant's Motion for Summary Judgment. (ECF No. 79).

We appreciate the Court's attention to this matter.

Respectfully submitted:

/s/ Daniel Cerone  
Daniel Cerone  
Div. Deputy City Solicitor  
*Attorney for Defendant City of Philadelphia*

/s/ Shawn K. Page, Esquire  
Shawn K. Page, Esquire  
*Counsel for the Plaintiffs*

Date: October 7, 2024

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**Civil Action  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the date below, this Joint Status Report was filed via the Court's electronic filing system and is available for downloading by all parties of record.

Date: October 7, 2024

/s/ Daniel Cerone  
Daniel Cerone  
Div. Deputy City Solicitor